

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

800 HOYT LLC,

Intervening Interpleader
Plaintiff, Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,

Interpleader Defendants,
and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants,
Interpleader Counter-Plaintiffs.

CASE NO. 1:20-CV-484-RDA-TCB

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL THE UNREDACTED
VERSION OF RESPONSE TO DEFENDANT CARLETON NELSON'S EMERGENCY
MOTION TO COMPEL THE DEPOSITION OF D. MATTHEW DODEN**

In accordance with the Agreed Protective Order in this case (Dkt. 55), Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. respectfully seek leave to file under seal the unredacted version of their Response to Defendant Carleton Nelson's Emergency Motion to Compel the Deposition of D. Matthew Doden ("Response").

Plaintiffs' unredacted version of their Response refers to information drawn from Dkt. 618-1, which contains and refers to material Plaintiffs have designated "Confidential" under the Protective Order and this Court has ordered sealed, and Dkt. 618-5, which Defendant Casey Kirschner has designated as "Confidential" under the Protective Order. Without waiving any objections they may have or relief they may seek under the Protective Order, Plaintiffs take no position as to Defendant's designation of the information at issue as "Confidential" but file this motion to comply with the Protective Order and Local Civil Rule 5(C).

Dated: April 7, 2021

Respectfully submitted,

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Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

Casey Kirschner
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s/ Michael R. Dziuban

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